

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

PURDUE PHARMA L.P., *et al.*,

Debtors.

Chapter 11

Case No.: 19-23649 (RDD)

(Jointly Administered)

**EXPERT DESIGNATION BY AMERICAN GUARANTEE
AND LIABILITY INSURANCE COMPANY, STEADFAST INSURANCE
COMPANY, AND NAVIGATORS SPECIALTY INSURANCE COMPANY**

Pursuant to paragraph 3.e.i of the Second Amended Order Granting Debtors' Motion for Order Establishing Confirmation Schedule and Protocols (Dkt. No. 2989), American Guarantee and Liability Insurance Company, Steadfast Insurance Company, and Navigators Specialty Insurance Company, parties in interest (collectively, the "Insurers") hereby designate Prof. Scott Harrington as a potential expert witness to testify concerning the extent to which the Fifth Amended Joint Plan of Reorganization (the "Plan," Dkt. No. 2982) is not "insurance neutral."¹

The Insurers reserve all rights, including the right to designate additional expert witnesses or subjects of expert testimony, to offer additional expert testimony, to supplement these disclosures, and to choose not to call Prof. Harrington or any other expert or fact witness in support of any confirmation objections Insurers may choose to file.

¹ By agreement with Debtors, the Insurers' deadline for filing this designation was extended by one week to June 14, 2021.

Dated: June 14, 2021
New York, NY

s/ Kelly H. Tsai

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